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STEPHANIE JENSEN

9
10 UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
11
12 SAN FRANCISCO DIVISION

13 UNITED STATES OF AMERICA,
14
Plaintiff,
15
v.
16 GREGORY L. REYES and STEPHANIE
JENSEN,
17
Defendants.

Case No. CR06-00556 CRB (EMC)

**STIPULATION AND ~~PROPOSED~~
ORDER REGARDING STEPHANIE
JENSEN'S SUMMARY OF PROPOSED
EXPERT TESTIMONY PURSUANT TO
RULE 16(b)(1)(C)**

Date: August 29, 2007
Time: 2:00 p.m.
Dept: Courtroom 8
Judge: Hon. Charles R. Breyer

1 The parties have met and conferred regarding the timing for Ms. Jensen to provide a
2 supplemental disclosure of proposed expert testimony pursuant to Federal Rule of Criminal
3 Procedure 16(b)(1)(C), and stipulate and agree as follows:

4 1. Whereas Ms. Jensen filed her original disclosure on May 2, 2007, which was 40
5 days before her original trial date;

6 2. Whereas, in an effort to resolve the Government's Motion *in limine* No. 3, Ms.
7 Jensen agreed to provide a supplemental disclosure to the Government by June 1, 2007;

8 3. Whereas, on May 31, 2007, the parties agreed to continue the disclosure date for
9 Ms. Jensen's supplemental disclosure until August 31, 2007;

10 4. Whereas, the parties have met and conferred and agree that Ms. Jensen can file
11 her supplemental disclosure closer to her own trial date;

12 THEREFORE, Ms. Jensen and the Government hereby stipulate and jointly request that
13 the Court enter an Order providing that:

14 5. Ms. Jensen shall have until 28 days before the date of her separate trial to provide
15 the Government with a Supplemental Disclosure pursuant to Federal Rule of Criminal Procedure
16 16(b)(1)(C); and

17 6. The Government shall have the option of renewing its motion challenging the
18 sufficiency of Ms. Jensen's disclosures any time until 14 days before the date of Ms. Jensen's
19 separate trial.

20
21 Respectfully submitted

22
23 Dated: August 29, 2007

SCOTT N. SCHOOLS
United States Attorney

24
25 By: /s/ Timothy Crudo

Brian J. Stretch
Timothy Crudo
Adam Reeves

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28 Concurrence obtained per General Order 45 X.B.

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2 Dated: August 29, 2007

KEKER & VAN NEST, LLP

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4 By: /s/ Jan Nielsen Little

JAN NIELSEN LITTLE
Attorneys for Defendant
STEPHANIE JENSEN

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8 **THE FOREGOING STIPULATION
IS APPROVED AND IS SO ORDERED.**

9
10 DATED: August 29, 2007

By: 

HONORABLE CHARLES R. BREYER

United States District Court Judge